

**UNITED STATES DISTRICT COURT
for the
DISTRICT OF MASSACHUSETTS**

PATRICK LONGLEY,
Plaintiff

V.

**BUCHANAN MARINE LP,
Defendant**

Civil Action

No. 04-12548-MLW

JOINT SCHEDULING STATEMENT

Now comes the parties in the above captioned matter and respectfully submits this joint proposed scheduling statement.

1. Beginning of Unrestricted Discovery

Completion of automatic discovery and commencement of unrestricted discovery
on September 30, 2005.

2. Designation of Plaintiff's Expert Testimony

Complete designation of expert testimony (including complete answers to expert interrogatories and/or completion of Rule 26 expert materials if required) on or before January 17, 2006

3. Designation of Defendant's Expert Testimony

Complete designation of expert testimony (including complete answers to expert interrogatories and/or completion of Rule 26 expert materials if required) on or before February 17, 2006.

4. All Dispositive Motions

All dispositive motions to be filed on or before May 1, 2006.

5. Close of Discovery

All discovery to be concluded on or before March 31, 2006.

6. Final Pretrial Conference

Final pretrial conference to be held on some date on or after May 15, 2006.

7. Deposition Testimony to be Used in Lieu of Trial Testimony

The Parties reserve the right to take de bene esse depositions of witnesses who will be unavailable for trial, at any time up to and including the last Friday preceding the date of trial.

8. Ready for Trial

The parties will be prepared for trial in this matter on or after May 15, 2006.

Plaintiff and Defendant attorneys affirmatively state that they have discussed the probable budget for prosecuting and defending this action with their clients and the signature of the Plaintiff and Defendant will follow.

Respectfully submitted for the
the Plaintiff, Patrick Longley,
by his attorney,

/s/ Carolyn M. Latti
Carolyn M. Latti, BBO 567394
David F. Anderson, BBO 560994
David J. Berg, BBO 558624
Latti & Anderson LLP
30-31 Union Wharf
Boston, MA 02109
(617) 523-1000

Respectfully submitted for the
the Defendant, Buchanan Marine, L.P.,
by his attorney,

/s/ Kevin Roche
Kevin Roche, Esquire
Halloran & Sage, LLP
One Goodwin Square
225 Asylum St.
Hartford, CT 06103

CERTIFICATE OF SERVICE

I hereby certify that on September , I electronically filed Joint Scheduling Statement with the Clerk of the Court using CM/ECF system which will send notification of such filing(s) to the following:

Kevin Roche, Esquire
Halloran & Sage, LLP
One Goodwin Square
225 Asylum St.
Hartford, CT 06103

Respectfully submitted for the
the Plaintiff,

/s/Carolyn M. Latti
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